

WPP

Via Certified Mail

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 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 U.S. DISTRICT COURT  
 OF CALIFORNIA

Via Regular Mail & Electronic mail (speters@rustconsulting.com)

LCD Indirect Class  
 P.O. Box 8025  
 Faribault, MN 55021-9425

October 2, 2014

Re: *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827

WPP Group USA, Inc. ("WPP Group"), on behalf of itself and its subsidiaries The Ogilvy Group LLC and Young & Rubicam Inc. (collectively, the "Claimants"), respectfully requests the Court to accept their claims filed in *In re TFT-LCD (Flat Panel) Antitrust Litigation*, MDL No. 1827 (the "Class Action").

WPP Group became aware of the Class Action in early 2014. Although the claim filing deadline in the Class Action was December 6, 2012, WPP Group was informed that late filed claims may nonetheless be considered. WPP Group conducted due diligence to gather and review data to determine the number of valid claims for the Claimants. As soon as WPP Group confirmed the data sources for the Claimants' claims, it filed such claims via registered mail on July 24, 2014. WPP Group had not been aware of an additional deadline of June 6, 2014 for late filed claims until on or around July 24, 2014.

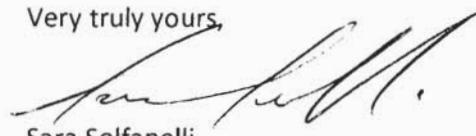
WPP Group is a marketing, communications and advertising network made up of several large operating company groups, with each operating company group consisting of multiple subsidiaries and affiliates. In the aggregate, the WPP Group network has hundreds of operating companies around the world, as well as in the US. WPP Group worked with each of the large operating company groups in the US to gather data to determine how many claims each group, and its respective subsidiaries, might have in the Class Action. This was an arduous task, which required working with multiple stakeholders across each operating company group. Although WPP Group was told it could extrapolate numbers based on historic headcount, it undertook the task to review any available data and made conservative estimates of valid claims based on existing data.

WPP Group respectfully requests that the Court accept the Claimants' late filed claims, because any delay was inadvertent and was caused by exercising due diligence in determining an unextrapolated number of valid claims. Further, the acceptance of such claims will not materially prejudice other Class Action claimants, who also had the ability to file claims late – in fact more than 18 months after the initial deadlines and up to a few weeks before Claimants' filings.

WPP

Should the Court or the Claims Administrator have any questions, please do not hesitate to contact me at 212-632-2517 or [ssolfanelli@wpp.com](mailto:ssolfanelli@wpp.com).

Very truly yours,



Sara Solfanelli  
SVP, Counsel for the Americas